

THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

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April 8, 2003

BY E-MAIL, AND  
FIRST CLASS U.S. MAIL

Stephen H. Bryant  
Vice President, Regulatory and Government Policy  
Bay State Gas Company  
300 Friberg Parkway  
Westborough, MA 01581-5039

Re: Bay State Gas Company, D.T.E. 03-10

Dear Mr. Bryant:

Enclosed is the Third Set of Information Requests by the Department of Telecommunications and Energy to Bay State Gas Company regarding the captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., April 22, 2003.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel  
Hearing Officer

Enc.  
cc: Mary Cottrell, Secretary

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. 03-10

THIRD SET OF INFORMATION REQUESTS TO  
BAY STATE GAS COMPANY

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Referring to the Company's 2002 SQ report filed on January 31, 2003 ("SQ Filing"), as supplemented on February 13, 2003 ("Supplemental Filing"), the Department of Telecommunications and Energy ("Department") submits to Bay State Gas Company ("Company") the following Information Requests.

**Requests**

- DTE 3-1      Please refer to the Company's responses in DTE 1-1.
- (a)      Explain why the number of Service Appointments for 2002 dropped to 83,667 (Supplemental Filing at § 3-2);
  - (b)      If applicable, please present the revised data on Service Appointments met for the year 2002 in one table in the same fashion as the data were presented in the Supplemental Filing at Att. D.
- DTE 3-2      Please refer to the Company's responses in DTE 1-2.
- (a)      Explain the discrepancies in the number of Consumer Division Cases per 1000 customers reported and the number reported in Bay State Gas Company, D.T.E. 99-72 for the following years: 1993, 1994, 1995.
  - (b)      Recalculate the mean and standard deviation taking into account the entire database available (1992-2001) and the Company's answer to DTE 3-2 (a).
- DTE 3-3      Please refer to the Company's responses in DTE 1-4. Explain why the Company does not provide historical data for Odor Calls from 1993 as the Company did in D.T.E. 99-72.
- DTE 3-4      Please refer to the Company's responses in DTE 1-5. Recalculate the mean and standard deviation for Billing Adjustments taking into account the entire database available (1992-2001).
- DTE 3-5      Please refer to the Company's responses in DTE 1-6. Explain why the Company did not provide historical data on Telephone Service Factor (Emergency calls) from 1998 to 2001.
- DTE 3-6      Please refer to the Company's responses in DTE 1-7.
- (a)      Explain the discrepancies in On-Cycle Meter Readings reported in the Company's response to DTE 1-7 and the number reported in the D.T.E. 99-72 for the years: 1993, 1994, 1995, and 1996;

- (b) Please recalculate the mean and standard deviation taking into account the entire database available (1993-2001) and the Company's answer to DTE 3-6 (a).

- DTE 3-7 Please update § I, and any other section, including § II-1, of the Company's Filing.
- DTE 3-8 Please provide historical data for Accidents pursuant to G.L. c. 164, § 95.
- DTE 3-9 Please provide calculations of any potential penalty or offset amount for all SQ penalty measures in which the Company's performance fall within the relevant means and deadbands, if any.
- DTE 3-10 Please detail the internal audits that have been conducted to assure the accuracy of Company data. If internal audits have not been performed, indicate the Company's plans to perform such audits.
- DTE 3-11 Please provide electronic versions of all responses, including calculations and worksheets together with your responses (DTE 3-1 to DTE 3-9).